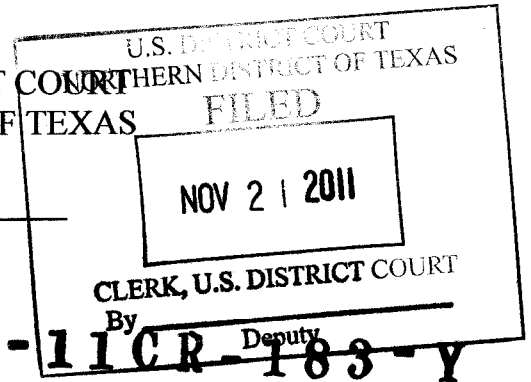


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

YOULANDA ROCHELLE WRIGHT (1)

§
§
§
§
§
§

NO.

4-11CR-183-Y

INFORMATION

The United States Attorney charges:

Count One

False Claim Against the United States
(Violation of 18 U.S.C. § 287)

That on or about January 31, 2007, in the Fort Worth Division of the Northern District of Texas, the defendant, **Youlanda Rochelle Wright**, knowingly made and presented to the Internal Revenue Service, an agency of the United States Treasury Department a claim against the United States for payment, which she then and there knew to be materially false, fictitious, and fraudulent, by preparing and causing to be prepared, and filing and causing to be filed, a 2006 United States Individual Income Tax Return, Form 1040A, wherein she claimed an income tax refund in the amount of \$3654.

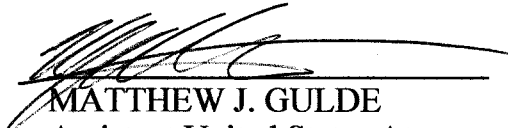
In violation of 18 U.S.C. § 287.

Count Two
Identity Theft
(Violation of 18 U.S.C. § 1028(a)(7) and (b)(2))

On or about February 6, 2008, in the Fort Worth Division of the Northern District of Texas, the defendant, **Youlanda Rochelle Wright**, did knowingly possess in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the Social Security Number ending in 4119 belonging to R.P., with the intent to commit any unlawful activity that constitutes a violation of Federal law, to wit, False Claim against the United States in violation of 18 U.S.C. § 287.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(2).

SARAH R. SALDAÑA
UNITED STATES ATTORNEY


MATTHEW J. GULDE
Assistant United States Attorney
State Bar of Illinois No. 6272325
801 Cherry Street, Unit #4
Burnett Plaza, Suite 1700
Fort Worth, TX 76102-6897
Telephone: 817.252.5200
Facsimile: 817.978.3094

ORIGINAL**4-11CR-183-Y**Criminal Case Cover Sheet**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS****Related Case Information**Superseding Indictment: ☐ Yes ☒ NoNew Defendant: ☒ Yes ☐ NoPending CR Case in NDTX: ☐ Yes ☒ No

Search Warrant Case Number: _____

Rule 20 from District of: _____

Magistrate Case Number: _____

1. Defendant InformationJuvenile: ☐ Yes ☒ NoSealed: ☐ Yes ☒ No

Defendant Name

YOULANDA ROCHELLE WRIGHT (1)

Alias Name

Address

2. U.S. Attorney InformationAUSA Matthew J. GuldeIllinois State Bar # 6272325**3. Interpreter**☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status

Arrest Date:

☐ Federal Inmate☐ Already in State Custody☒ On Pretrial Release☒ Summons to Issue**5. U.S.C. Citations**Total # of Counts as to This Defendant: 2 ☐ Petty ☐ Misdemeanor ☒ FelonyCitationDescription of Offense ChargedCount(s)

18 U.S.C. § 287

False Claim Against the United States

1

18 U.S.C. § 1028(a)(7)
and (b)(2)

Identity Theft

2

Date

11/21/11

Signature of AUSA: _____

